

Appln. Serial No. 10/676,220  
Amendment Dated May 12, 2006  
Reply to Office Action Mailed February 13, 2006

REMARKS

In the Office Action dated February 13, 2006, the Specification and claims were objected to; and claims 1-16 and 18-24 were rejected under 35 U.S.C. § 102 over U.S. Patent No. 6,212,097 (Kihara).

Applicant acknowledges the indication that claim 17 contains allowable subject matter.

Appl. Serial No. 10/676,220  
Amendment Dated May 12, 2006  
Reply to Office Action Mailed February 13, 2006

**OBJECTION TO THE SPECIFICATION**

Although the Office Action indicated that the status of referenced U.S. applications should be updated, it is noted that the present application does not refer to any related application.

The title has been amended to address the objection to the title.

Appln. Serial No. 10/676,220  
Amendment Dated May 12, 2006  
Reply to Office Action Mailed February 13, 2006

**CLAIM OBJECTIONS**

Claims 20-24 have been amended as suggested by the Examiner to address the objection.

Appln. Serial No. 10/676,220  
Amendment Dated May 12, 2006  
Reply to Office Action Mailed February 13, 2006

**EXAMINER'S REQUEST FOR INFORMATION**

In response to the Examiner's request for information, the undersigned has made an inquiry with a representative for Assignee for references qualifying as prior art. The inventor is no longer an employee of Assignee, and thus the undersigned was unable to contact the inventor. The following references (attached) have been identified: (1) U.S. Patent Application Publication No. 2005/0027706, filed July 31, 2003, published February 3, 2005; and (2) U.S. Patent Application Publication No. 2005/0114356, filed November 20, 2003, published May 26, 2005.

Note that U.S. Patent Application Publication No. 2005/0114356 was filed after the filing date of the present application, and therefore does not constitute prior art.

U.S. Patent Application Publication No. 2005/0027706 describes an object-oriented data storage (see Abstract). A system for the object-oriented data storage includes an intelligent object editor capable of accessing data content and a destination storage device coupled to the intelligent object editor (see Abstract). No discussion is provided in U.S. Patent Application Publication No. 2005/0027706 of hierarchical data structures.

Applicant is also attaching copies of the following references received by Applicant in an Office Action issued in the 2005/0114356 application:

U.S. Patent No. 5,864,870;  
U.S. Patent No. 6,496,868.

The undersigned has not yet had an opportunity to review these two references.

Appln. Serial No. 10/676,220  
Amendment Dated May 12, 2006  
Reply to Office Action Mailed February 13, 2006

REJECTION UNDER 35 U.S.C. § 102

Claim 17 has been amended from dependent form to independent form, with claim 17 now incorporating the subject matter of former claims 15 and 16 (both now cancelled). The scope of claim 17 has not been changed with this amendment. As indicated by the Office Action, claim 17 is now in condition for allowance.

Independent claim 20 has been amended to incorporate subject matter similar to that of claim 17, indicated by the Office Action as being allowable. Therefore, claim 20 is also in condition for allowance. As requested by the Examiner, support for the amendment made to claim 20 can be found in original claim 17, and at least in ¶ [0012] of the Specification.

Claim 1 has been amended to incorporate subject matter of former claim 2, with claim 1 further reciting that a storage location stores a table having plural entries, each of the plural entries mapping a corresponding identifier of a hierarchical data structure to a respective range of block addresses. Claim 1 further recites that a controller responds to a request containing an identifier of at least one of the hierarchical data structures by generating one or more block addresses based on the identifier in the request by accessing the table. As requested by the Examiner, support for the amendments of claim 1 can be found in original claim 2, and at least in ¶¶ [0012] and [0013] of the Specification.

The subject matter of amended claim 1 is not disclosed by Kihara. It is noted that with respect to dependent claim 18 (which depended from former claim 15), the Office Action had cited Figs. 5-7 of Kihara as disclosing a table of identifiers and corresponding block addresses. 2/13/2006 Office Action at 8. Fig. 5 of Kihara is a schematic diagram showing the physical structure of data in a flash memory 42 of a memory card 40. Kihara, 10:9-11. In the flash memory 42 of Kihara, a data unit is divided into a predetermined number of fixed length blocks. *Id.*, 10:11-13. However, Fig. 5 of Kihara and its accompanying text do not disclose a table having plural entries, where each of the plural entries maps an identifier of a hierarchical data structure to a respective range of block addresses.

Fig. 6 of Kihara is a schematic diagram showing a memory map, where the top area of the memory map is a partition table portion (that contains the start address and the end address of a FAT partition area). The memory map further includes a block area, a boot sector, a FAT area, a FAT backup area, a root directory area, a sub directory area, and a data area. *Id.*, 11:60-12:5.

Appl. Serial No. 10/676,220  
Amendment Dated May 12, 2006  
Reply to Office Action Mailed February 13, 2006

Again, Fig. 6 of Kihara and its accompanying text do not disclose a table having the plural entries recited in claim 1.

Fig. 7 of Kihara is a schematic diagram showing the file structure of the memory card 40, where the file structure includes a still pictures directory, a moving picture directory, a voice directory, a control directory, and a music directory. *Id.*, 14:19-22. Again, there is no teaching in Fig. 7 or the text accompanying Fig. 7 in Kihara of the table having entries mapping identifiers of hierarchical data structures to respective ranges of block addresses recited in claim 1.

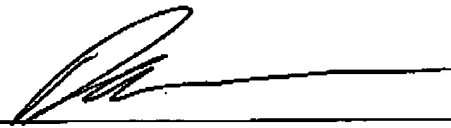
Since Kihara does not disclose each and every element of claim 1, it is respectfully submitted that claim 1 is not anticipated by Kihara.

Dependent claims are allowable for at least the same reasons as corresponding independent claims.

Allowance of all claims is respectfully requested. The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 08-2025 (200207307-1).

Respectfully submitted,

Date: May 12, 2006

  
\_\_\_\_\_  
Dan C. Hu  
Registration No. 40,025  
TROP, PRUNER & HU, P.C.  
8554 Katy Freeway, Suite 100  
Houston, TX 77024  
Telephone: (713) 468-8880  
Facsimile: (713) 468-8883